

**UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEW JERSEY**

SADEK & COOPER
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Attorneys for Debtor

In re: : IN BANKRUPTCY
: CHAPTER 13
Osiris Padilla :
:
: CASE NO. 18-25358 (JNP)
Debtor(s) :
: Hearing Date: September 21, 2021 at 11:00 AM
: ORAL ARGUMENT WAIVED

**NOTICE OF MOTION TO VACATE STAY ORDER AND REINSTATE
THE AUTOMATIC STAY PURSUANT TO 11 U.S.C. § 105 AS TO
US BANK TRUST NA as TRUSTEE of DWELLING SERIES IV TRUST**

TO:

United States Trustee's Office
One Newark Center, Suite 2100
Newark, NJ 07102

Isabel C. Balboa, Trustee
Office of the Chapter 13 Standing Trustee
535 Route 38, Suite 580
Cherry Hill, NJ 08002

US Bank Trust NA as Trustee of Dwelling Series Iv Trust
Attn: President/CEO/Bankruptcy Dept.
15480 Laguna Canyon Road
Irvine, CA 92618

US Bank Trust NA as Trustee of Dwelling Series Iv Trust
Attn: Parke McCay
9000 Midlantic Drive, Ste 300
Mt. Laurel, NJ 08054

PLEASE TAKE NOTICE that on September 21, 2018 at 10:00 AM in the forenoon, or as soon thereafter as counsel may be heard, the undersigned attorney for Debtor will move before the Honorable Jerrold N. Poslusny, United States Bankruptcy Judge, United States Bankruptcy Court, 1 John F. Gerry Plaza, 4th & Cooper, 4th Floor, Camden, New Jersey 08101, for an Order Vacating Stay Order and Reinstating the Automatic

Stay as to US Bank Trust NA as Trustee of Dwelling Series IV Trust, and for any other and further relief as may be fair and equitable.

PLEASE TAKE FURTHER NOTICE that, at the return date herein, the undersigned will rely on the annexed Certification.

PLEASE TAKE FURTHER NOTICE that any and all objections to the relief requested herein must be filed with the Court and served on the undersigned no later than seven (7) days prior to the hearing date set forth above.

Pursuant to D.N.J. LBR 9013-2, the undersigned counsel certifies that no brief is required, as the issues are primarily factual and the facts necessary to rule on this motion have been set forth in the attached Certification. Counsel further requests that this matter be heard on the papers unless opposition is filed or the Court requests oral argument.

SADEK & COOPER
Attorneys for Debtors

Dated: August 19, 2021

By: /s/ Jeanie D. Wiesner
Jeanie D. Wiesner, Esq.